

EXHIBIT “1”

EXHIBIT “1”

LMS Packing Slip

Package ID: 2698393

Tracking Number: 786234762348
Package Recipient: Rhonda McCurtain
Recipient Company: Lazer Spot
Recipient Address: 6525 Shiloh Road Suite 900 Alpharetta
GA 30005 USA
Phone Number: 6787712617

Package Contents:

Transmittal Number	Case Number	Title of Action
16502718	A-17-752871-C	Lepatrick Featherston vs. Lazer Spot, Inc.



CORPORATION SERVICE COMPANY®

Notice of Service of Process

Transmittal Number: 16502718
Date Processed: 04/13/2017

Primary Contact: Rhonda Wilcox McCurtain
Lazer Spot
6525 Shiloh Road
Suite 900
Alpharetta, GA 30005

Entity:	Lazer Spot, Inc. Entity ID Number 2946485
Entity Served:	Lazer Spot, Inc.
Title of Action:	Lepatrick Featherston vs. Lazer Spot, Inc.
Document(s) Type:	Summons/Complaint
Nature of Action:	Class Action
Court/Agency:	Clark County District Court, Nevada
Case/Reference No:	A-17-752871-C
Jurisdiction Served:	Nevada
Date Served on CSC:	04/11/2017
Answer or Appearance Due:	20 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Kaine Messer 702-259-7777

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | sop@cscglobal.com

SUMM

District Court
CLARK COUNTY, NEVADA

ORIGINAL

LEPATRICK FEATHERSTON, an individual,
on behalf of himself and all persons similarly
situated;

Case No. A-17-752871-C
Dept. No. XXXII

vs. Plaintiffs,

SUMMONS

LAZER SPOT, INC., a foreign corporation;
EMPLOYEE(S)/AGENT(S) DOES I-X; and
ROE CORPORATIONS XI-XX, inclusive,

Defendants.

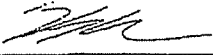
**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD
UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.**

TO THE DEFENDANT: A Civil Complaint has been filed by the plaintiff against you for the relief set forth in the Complaint.


Lazer Spot, Inc. c/o CSC Services of Nevada, Inc.

1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you exclusive of the day of service, you must do the following:
 - a. File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court.
 - b. Serve a copy of your response upon the attorney whose name and address is shown below.
2. Unless you respond, your default will be entered upon application of the plaintiff and this Court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.
3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

Issued at the request of:


Kaine Messer
Nevada Bar No. 14240
170 S. Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Attorney for Plaintiff

STEVEN D. GRIERSON, CLERK OF COURT

By: 
Deputy Clerk
County Courthouse
200 South Third Street
Las Vegas, Nevada 89101

Date

VIVIAN A. CANELA

MAR 23 2017

*NOTE: When service is by publication, add a brief statement of the object of the action.
See Rules of Civil Procedure, Rule 4(b).

STATE OF _____)
) ss: AFFIDAVIT OF SERVICE
 COUNTY OF _____)

_____, being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceeding in which this affidavit is made. That affiant received _____ copy(ies) of the Summons and Complaint, on the ____ day of _____, 2017 and served the same on the ____ day of _____, 2017 by:

(affiant must complete the appropriate paragraph)

1. delivering and leaving a copy with the defendant _____ at (state address) _____.
2. serving the defendant _____ by personally delivering and leaving a copy with _____, a person of suitable age and discretion residing at the defendant's usual place of abode located at (state address) _____.

(Use paragraph 3 for service upon agent, completing A or B)

3. serving the defendant _____ by personally delivering and leaving a copy at (state address) _____.
 - a. with _____ as _____, an agent lawfully designated by statute to accept service of process;
 - b. with _____, pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

4. personally depositing a copy in a mail box of the United States Post Office, enclosed in a sealed envelope postage prepaid (check appropriate method):

____ Ordinary mail
 ____ Certified mail, return receipt requested
 ____ Registered mail, return receipt requested

addressed to the defendant _____ at the defendant's last known address which is (state address) _____.

Executed this ____ day of _____, 20____.

 Signature of person making service

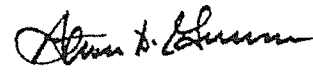
SUBSCRIBED AND SWORN to before me this

____ day of _____, 2016.

NOTARY PUBLIC in and for said County
 and State

My commission expires:

Electronically Filed
03/22/2017 04:19:13 PM


CLERK OF THE COURT

1 **COMJD**

2 GABROY LAW OFFICES
3 Christian Gabroy (#8805)
4 Kaine Messer (#14240)
5 The District at Green Valley Ranch
6 170 South Green Valley Parkway, Suite 280
7 Henderson, Nevada 89012
8 Tel (702) 259-7777
9 Fax (702) 259-7704
10 christian@gabroy.com
11 kmesser@gabroy.com
12 Attorneys for Plaintiff

8 **EIGHTH JUDICIAL DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 LEPATRICK FEATHERSTON, an
11 individual, on behalf of himself and all
12 persons similarly situated;

11 Plaintiffs,

12 vs.

13 LAZER SPOT, INC., a foreign
14 corporation; EMPLOYEE(S)/AGENT(S)
15 DOES I-X; and ROE CORPORATIONS XI-
16 XX, inclusive,

15 Defendants.

Case No.: A-17-752871-C
Dept.: XXXII

COMPLAINT WITH JURY DEMAND

17 **COMPLAINT**

18 COMES NOW Plaintiff Lepatrack Featherston, an individual ("Plaintiff" or
19 "Featherston"), on behalf of himself and all other persons similarly situated, and hereby
20 alleges and complains against Defendant Lazer Spot, Inc., ("Defendant" or "Lazer
21 Spot") and states as follows:

22 **NATURE OF PLAINTIFF'S CLAIMS**

23 1. This lawsuit arises under the Fair Labor Standards Act, 29 U.S.C. §201, et
24 seq. ("FLSA") for Defendant's failure to pay lawful wages to Plaintiff and those similarly
25 situated.

26 2. This lawsuit also arises under Nevada state law in regards to a singular
27 action on behalf of the named Plaintiff Featherston for Defendant's failure to pay him his
28 lawful wages.

GABROY LAW OFFICES
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7717 FAX: (702) 259-7704

1 relevant times within the scope, purpose and authority of said partnership, joint venture,
2 agency, service, employment, and conspiracy, and with the knowledge, consent,
3 permission, acquiescence, and ratification of their co-defendants.

4 12. Based on information and belief, Defendant Lazer Spot is a Foreign
5 Corporation, licensed and listed with the Secretary of State in Nevada to do business in
6 Nevada.

7 13. Based on information and belief, Defendant Lazer Spot is a professional
8 services corporation that specializes in yard management including but not limited to
9 spotting, shuttling within 100 miles, trailer rentals, gate personnel staffing, and
10 computerized yard management systems.

11 14. Based on information and belief, Defendant Lazer Spot, Inc. is currently
12 listed as "active" with the Secretary of State in Nevada and continues to do business in
13 Nevada.

14 15. At all times relevant, Defendant Lazer Spot was Plaintiff Featherston's
15 employer as such term is defined in the Nevada Constitution, and N.R.S. Chapter 608
16 *et. seq.* in that it had custody or control over the Plaintiff, his employment, had
17 responsibility for Plaintiff's labor and employment matters while Plaintiff was employed by
18 them at the time Plaintiff's wages were lawfully due.

19 16. At all times relevant, Defendant Lazer Spot was Plaintiff's employer as
20 such term is defined in the FLSA 29 U.S.C. §203 *et. seq.* in that it had custody or
21 control over Plaintiff's labor and employment matters while Plaintiff was employed by
22 them at the time Plaintiff's wages were lawfully due.

23 17. At all times relevant, Plaintiff was an employee of Defendant as that term
24 is defined 29 U.S.C. §203 *et. seq.*

25 18. Plaintiff was not exempt from any overtime provisions of the FLSA and
26 Nevada law.

27
28

GABROY LAW OFFICES
 170 S. Green Valley Pkwy., Suite 280
 Henderson, Nevada 89012
 (702) 259-7777 FAX: (702) 259-7704

19. Defendant Lazer Spot managed Plaintiff's work and dictated, controlled and ratified the wage and hour policies and all related employee compensation policies of Plaintiff and similarly situated employees.

20. Plaintiff does not know the true names or capacities of Defendants sued herein as Does I-X or Roe Corporations XI-XX inclusive and will seek leave to amend this Complaint to correctly designate those parties as soon as their correct names and capacities are ascertained. Plaintiff is informed and believe and thereupon allege that each of said Defendants were in some manner legally responsible for the unlawful actions set forth herein and acting as Plaintiff's employer.

21. On or about February 7, 2017, Plaintiff mailed a five (5) day demand, pursuant to NRS §608.140 to Defendant. A true and accurate copy of such demand is hereby attached as Exhibit I. Defendant did not honor such demand within five days and the demand was withdrawn.

JURISDICTION AND VENUE

22. This Court has jurisdiction over Plaintiff's FLSA claims pursuant to 29 U.S.C. §216(b) which states in relevant part that this action may be maintained in any Federal or State court of competent jurisdiction.

23. This Court also has jurisdiction over Nevada state law claims.

24. Plaintiff hereby files notice of his consent to joinder. Such true and correct copy of his consent to joinder is hereby attached as Exhibit II.

REPRESENTATIVE ALLEGATIONS

25. The named Plaintiff brings Plaintiff's FLSA claims on his own behalf, on the behalf of the class of all persons similarly situated, and on behalf of the general public.

26. The claims of the named Plaintiff are typical of the claims of the above described plaintiff class in that the interests of the named Plaintiff are co-extensive with the interests of the other members of the plaintiff class, there is a lack of adverse interests between the named Plaintiff and the other members of the plaintiff class, and

GABROY LAW OFFICES
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

1. common questions of law and fact exist as to the claims of the named Plaintiff and the
2. claims of the members of the plaintiff class. The named Plaintiff will fairly and
3. adequately protect the interests of the plaintiff class, will serve as an adequate
4. representative plaintiff on behalf of the plaintiff class, and has retained experienced
5. counsel that are qualified to represent the plaintiff class.

6. GENERAL ALLEGATIONS

7. 27. On or about February 11, 2015, Plaintiff was hired and began work for
8. Defendant.

9. 28. Defendant hired Plaintiff as a yard driver.

10. 29. Plaintiff was hired as a yard driver whose daily tasks included but were not
11. limited to driving trailers around the yard area, staging delivery trucks, and driving to
12. outside locations to retrieve products loaded onto pallets.

13. 30. As such, Plaintiff seeks a collective action on behalf himself and all those
14. similarly situated to him.

15. 31. Plaintiff Featherston was paid on an hourly basis at a rate of \$16.50. See
16. a true and correct copy of Plaintiff's redacted paycheck attached as Exhibit III.

17. 32. Defendant routinely instructed and required Plaintiff to work in excess of
18. forty hours per week and/or eight hours per day.

19. 33. Plaintiff routinely worked in excess of forty hours per week and in excess
20. of eight hours a day, but Defendant did not provide Plaintiff overtime compensation for
21. such work. For example and on a weekly basis, Defendant failed to pay Plaintiff
22. overtime wages for work during the week of July 25, 2016 to July 31, 2016 during which
23. Plaintiff worked in excess of forty hours per week. See Exhibit III.

24. 34. Defendant failed to pay Plaintiff overtime wages for work during the week
25. of August 1, 2016 to August 7, 2016 during which Plaintiff worked in excess of forty
26. hours per week but was not paid overtime compensation. See Exhibit III.

27. 35. Pursuant to 29 U.S.C. §207, Plaintiff was entitled to be compensated at a
28. rate of one and one-half times a regular hourly rate of pay for all time worked in excess

GABROY LAW OFFICES
 170 S. Green Valley Pkwy., Suite 280
 Henderson, Nevada 89012
 (702) 259-7777 FAX: (702) 259-7704

1 of forty hours in individual workweeks.

2 36. Defendant did not compensate Plaintiff at a rate of one and one-half times
 3 his regular hourly rate of pay for all time worked in excess of forty (40) hours in
 4 individual workweeks and/or Defendant did not pay Plaintiff for all hours worked.

5 37. On or about January 24, 2017, Plaintiff was no longer employed by
 6 Defendant.

7 38. On information and belief, Defendant represents to the general public that
 8 it "is the industry leader in third-party yard management services."

9 39. On information and belief, Defendant represents to the general public that
 10 its "2000-plus employees work at operations in 30 states."

11 **COUNT I**
 12 **VIOLATION OF THE FAIR LABOR STANDARDS ACT – WAGES**
 13 **29 U.S.C. §203 et. seq.**
 14 **NAMED PLAINTIFF INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY**
 15 **SITUATED AGAINST ALL DEFENDANTS**

16 40. Plaintiff hereby repeats and realleges the allegations contained in the
 17 preceding Paragraphs 1 through 39 as though fully set forth herein and incorporates the
 18 same herein by reference.

19 41. This count arises from Defendant's violation of the FLSA, 29 U.S.C. §201
 20 et. seq. for its failure to pay Plaintiff overtime compensation for each hour worked.

21 42. At all material times hereto, Plaintiff was employed by Defendant as an
 22 "employee" within the meaning of §203(e)(1) of the FLSA.

23 43. Plaintiff performed a variety of job duties, labor, services, and
 24 responsibilities for Defendant within this judicial district that are subject to the aforesaid
 25 provisions of the FLSA.

26 44. Plaintiff performed a variety of job duties and responsibilities such as that
 27 of a yard driver for Defendant within this judicial district.

28 45. Such job duties and responsibilities included but were not limited to driving
 trailers around the yard area, staging delivery trucks, and driving to outside locations to
 retrieve products loaded onto pallets.

GABROY LAW OFFICES
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

1 46. Plaintiff had been an employee of the Defendant during the time period
2 pertinent to this Complaint, and during a portion of the three years immediately
3 preceding the initiation of this action.

4 47. At all material times hereto, Defendant was Plaintiff's "employer" per the
5 FLSA, 29 U.S.C. §203(d).

6 48. The named Plaintiff brings this first claim for relief pursuant to 29 U.S.C.
7 216(b) and has consented in writing to join this action. See Exhibit II, Plaintiff's Consent
8 to Joinder.

9 49. At all times relevant and during the course of his employment for
10 Defendant, Plaintiff and those similarly situated were employed by Defendant and were
11 not exempt from the overtime provisions of the FLSA 29 U.S.C. §207, *et. seq.*

12 50. Pursuant to 29 U.S.C. §207, Plaintiff and those similarly situated to
13 Plaintiff were entitled to be compensated at a rate of one and one half times a base
14 hourly pay rate for each hour worked in excess of forty hours per week.

15 51. Plaintiff and those similarly situated were directed by Defendant to work,
16 and did such work in excess of forty hours per week.

17 52. Defendant did not compensate Plaintiff at a rate of one and one-half times
18 his regular hourly rate of pay for all time worked in excess of forty (40) hours in
19 individual workweeks. Instead, Defendant provided Plaintiff with an hourly rate of \$16.50
20 for all hours worked, including hours worked in excess of forty (40) in individual work
21 weeks. For example, Plaintiff worked in excess of 40 (forty) hours per week but was
22 paid only on a set hourly basis. In violation of the law, Plaintiff worked in excess of 40
23 hours per week but was not paid overtime compensation.

24 53. Defendant's failure and refusal to pay lawful wages to Plaintiff for overtime
25 wages owed violated the FLSA, 29 U.S.C. §207, *et. seq.*

26 54. Defendant willfully violated the FLSA by refusing to pay Plaintiff and those
27 similarly situated all lawful wages, including overtime compensation.
28

GABROY LAW OFFICES
 170 S. Green Valley Pkwy., Suite 280
 Henderson, Nevada 89012
 (702) 259-7777 FAX: (702) 259-7704

55. All of the alleged various violations of the law herein were committed intentionally and/or willfully by the Defendant herein.

56. Per the FLSA, Plaintiff and those similarly situated who elect in writing to join this lawsuit by filing a written consent with the Court seek all available damages including but not limited to attorneys' fees, liquidated damages, and all lawful wages. Plaintiff seeks a judgment for unpaid overtime compensation, and additional liquidated damages of one hundred percent of any unpaid overtime compensation, such sums to be determined based upon an accounting of the hours worked by, and wages actually paid to the named Plaintiff.

57. Plaintiff also seeks an award of attorney's fees, interest and costs as provided for by the FLSA.

COUNT II
FAILURE TO PAY WAGES / OVERTIME
N.R.S. 608.05 et. seq.
NAMED PLAINTIFF INDIVIDUALLY AGAINST CORPORATE DEFENDANT

58. Plaintiff hereby repeats and realleges and incorporate paragraphs 1 through 57 of this Complaint as though fully set forth herein.

59. Plaintiff brings this claim for unpaid overtime wages and penalties per Nevada State Law on behalf of himself only.

60. NRS 608.005, et. seq. which applies to Defendant's business, states that an employee must be paid overtime, equal to one and a half times the employee's regular rate of pay, for all hours worked in excess of forty (40) hours per week or eight (8) hours per day. Defendant failed to pay Plaintiff his lawful wages in accordance with NRS 608.005, et. seq. by compensating Plaintiff on a set basis of \$16.50 per hour although Plaintiff often worked over forty hours a week, Defendant failed to pay Plaintiff his lawful wages.

61. Pursuant to N.R.S. 608.018, Plaintiff was entitled to receive one and one-half times his regular wage rate whenever he worked in excess of eight hours per day or forty hours per week.

GABROY LAW OFFICES
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

1 62. Plaintiff was routinely directed by Defendant to work in excess of eight
2 hours per day and forty hours per week, and did such work, but Defendant did not pay
3 Plaintiff one and one-half times their regular wage for such hours worked in excess of
4 eight hours per day or forty hours per week.

5 63. Plaintiff was not exempt from any provision of the Nevada statutes
6 regarding overtime compensation.

7 64. Defendant's failure and refusal to pay lawful wages to Plaintiff his overtime
8 wages owed violated N.R.S. 608.005 *et. seq.*

9 65. As a direct proximate result of Defendant's failure to pay lawful wages to
10 Plaintiff and those similarly situated have suffered general, special, and consequential
11 damages in an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

12 66. Pursuant to NRS 608.005, 608.040 and 608.140, *et. seq.* Plaintiff seeks all
13 available damages for such unlawful payment practices and improper records of wages.

14 67. Plaintiff seeks all available damages for Defendant's violation of NRS
15 608.016 and suitable injunctive relief, along with attorney's fees, costs, and interest.

16 68. It was necessary for Plaintiff to retain the services of an attorney to file this
17 action which entitles Plaintiff to an award of reasonable attorneys' fees and costs in this
18 suit.

19 **WHEREFORE**, Plaintiff prays for judgment against Defendant as follows:

- 20 1. For damages in excess of \$15,000.00;
- 21 2. A judgment in the amount of all overtime wages, and lawful wages
22 owed to Plaintiff;
- 23 3. All damages and penalties owed to Plaintiff under NRS 608.005, *et.*
24 *seq.*;
- 25 4. For all damages and relief owed to Plaintiff under the Nevada
26 Constitution;
- 27 5. For liquidated damages;
- 28 6. For injunctive relief;

GABROY LAW OFFICES
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

1 7. For declaratory relief;

2 8. For attorneys' fees and costs incurred in this action; and

3 9. For such other additional relief as the Court deems just and proper.

4 Dated this 22 day of March 2017.

5 Respectfully submitted,

6 GABROY LAW OFFICES

7
8 By: 
9 Christian Gabroy, Esq.
10 Kaine Messer, Esq.
11 The District at Green Valley Ranch
12 170 South Green Valley Parkway
13 Suite 280
14 Henderson, Nevada 89012
15 Tel (702) 259-7777
16 Fax (702) 259-7704
17 christian@gabroy.com
18 kmesser@gabroy.com
19 Attorneys for Plaintiff

GABROY LAW OFFICES
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

DMJT

GABROY LAW OFFICES
Christian Gabroy, Esq. (#8805)
Kaine Messer, Esq. (#14240)
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Tel (702) 259-7777
Fax (702) 259-7704
Christian@gabroy.com
Kmesser@gabroy.com
Attorneys for Plaintiffs

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

LEPATRICK FEATHERSTON, an
individual, on behalf of himself and all
persons similarly situated;

Plaintiffs,

vs.

LAZER SPOT, INC., a foreign
corporation; EMPLOYEE(S)/AGENT(S)
DOES I-X; and ROE CORPORATIONS XI-
XX, inclusive,

Defendants.

Case No.
Dept. No.

JURY DEMAND

COMES NOW Plaintiff Lepatrick Featherston ("Plaintiff" or Featherston), by
and through the law firm of Gabroy Law Offices and hereby demands a jury trial of all
issues in the above-captioned matter.

Dated this 22nd day of March 2017.

GABROY LAW OFFICES.

By: 

Christian Gabroy (#8805)
Kaine Messer (#14240)
170 South Green Valley Parkway,
Suite 280
Henderson, Nevada 89012
Fax (702) 259-77
Attorneys for Plaintiff

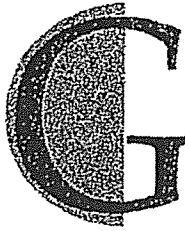
EXHIBIT I

Christian Gabroy, Esq.*

Kaine Messer, Esq.**

*Also admitted in Illinois

** Also admitted in California



GABROY LAW OFFICES

The District at Green Valley Ranch
170 S. Green Valley Pkwy. Ste. 280| Henderson, NV
89012

Office: (702) 259-7777 | Facsimile: (702) 259-7704

February 7, 2017

**FIVE DAY DEMAND UNDER NRS 608.140, NOTICE TO PRESERVE
EVIDENCE, NOTICE OF REPRESENTATION, AND DEMAND FOR
PERSONNEL FILE/PERSONNEL RECORDS UNDER NRS 613.075**

VIA CERTIFIED MAIL

Lazer Spot, Inc.
c/o CSC Services of Nevada, Inc.
2215-B Renaissance Drive
Las Vegas, NV 89119

Re: Lepatrick Featherston

Dear Lazer Spot, Inc.,

Our firm has been retained to represent the interests of Mr. Lepatrick Featherston ("Mr. Featherston") in relation to his former employment with Lazer Spot, Inc. ("Lazer Spot").

As Mr. Featherston is a represented party, any communication regarding him should be addressed to my office at the above address. This means any document, correspondence, and any other matter must be addressed to my attention per our rules of Professional Responsibility and other state and federal case law regarding this matter.

Per this notice herein, this is to serve as a letter of notice of preservation per *Zubalake v. UBS Warburg* and *Coleman v. Morgan Stanley*. This letter is to further serve as a litigation hold. Thus, no documents, whether in hard copy format or electronic format, shall be destroyed, altered, and/or tampered with in any fashion.

In the unlikely event that anyone has reviewed any evidence requested in this litigation hold notice and otherwise and determined that such evidence does not relate to this matter, this letter is to serve as a request that such evidence be

preserved in order to allow the jury to confirm such determination at trial. Thus, this is to serve as notice to preserve all evidence.

Further this correspondence is to demand all personnel records of Mr. Featherston under NRS 613.075. Please provide all paystubs, time cards, records of wages, and all other personnel records while Mr. Featherston was employed with Lazer Spot, Inc. Please forward such records to my office immediately.

Under NRS 608.140, Mr. Featherston herein provides a five-day demand in the amount of \$14,874.75 (Fourteen Thousand Eight Hundred Seventy-Four Dollars and Seventy-Five Cents). This appears to be an extremely reduced amount. If such demand is not met within five days, Mr. Featherston will withdraw this demand without notice and pursue his remedies to the fullest extent of the law.

If you have any questions, please feel free to contact me.

Very truly yours,

GABROY LAW OFFICES



Christian Gabroy, Esq.

CJG/lk/km

EXHIBIT II

CONSENT TO JOINDER

I Lepatrick Featherston, by signing below, hereby consent to join this case as a Plaintiff pursuant to 29. U.S.C. 216(b).

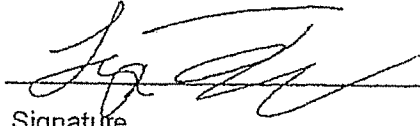

Signature

EXHIBIT III

CO. FILE DEPT. CLOCK VCHR. NO.
 B20 009212 100489 0000310977 1
 981-0001

LAZER SPOT, INC.

Earnings Statement



Period Beginning: 07/25/2016
 Period Ending: 07/31/2016
 Pay Date: 08/05/2016

Taxable Marital Status: Single
 Exemptions/Allowances:
 Federal: 2
 NV: No State Income Tax

LEPATRICK DENTANIYON FEATHERSTO
 1701 ROCK SPRINGS DRIVE
 #2133
 LAS VEGAS NV 89128

Earnings	rate	hours	this period	year to date
Driver Pay	16.5000	50.50	833.26	27,542.73
Extra Pay				49.50
Gate Clerk				499.13
Holiday				395.00
Personal				132.00
Gross Pay			\$833.26	28,619.36

* Excluded from federal taxable wages
 Your federal taxable wages this period are \$791.15

Other Benefits and Information	this period	total to date
401K Wages	833.26	

Deductions	Statutory		
Federal Income Tax	-79.90	2,986.46	
Social Security Tax	-49.05	1,680.32	
Medicare Tax	-11.47	392.98	
Other			
Ad & D Emp	-0.76	23.74	
Child Support	-38.08	1,180.48	
Garn Admin Fee	-6.00	186.00	
Ltd	-1.23	27.06	
Ptax Dental	-2.00*	62.00	
Ptax Hsa	-5.00*	365.00	
Ptax Plan 1	-34.13*	1,058.03	
Ptax Vision	-0.98*	32.36	
Spprt\$	-0.50	15.50	
Vol Life	-1.50	46.50	
Mvr		10.00	
Net Pay	\$602.66		
Checking1	-602.66		
Net Check	\$0.00		

Important Notes
 YOUR COMPANY'S PHONE NUMBER IS 678-771-2600

LAZER SPOT, INC.
 6525 SHILOH ROAD, SUITE 900
 ALPHARETTA, GA 30005

Advice number: 00000310977
 Pay date: 08/05/2016

Deposited to the account of	account number	transit ABA	amount
LEPATRICK DENTANIYON FEATHERSTON	xxxxxx4506	xxxx xxxx	\$602.66

THIS IS NOT A CHECK

NON-NEGOTIABLE

CO. FILE DEPT. CLOCK VCHR. NO.
B20 009212 100489 0000320977 1
979-0001

LAZER SPOT, INC.

Taxable Marital Status: Single
Exemptions/Allowances:
Federal: 2
NV: No State Income Tax

Earnings Statement



Period Beginning: 08/01/2016
Period Ending: 08/07/2016
Pay Date: 08/12/2016

LEPATRICK DENTANIYON FEATHERSTO
1701 ROCK SPRINGS DRIVE
#2133
LAS VEGAS NV 89128

Earnings	rate	hours	this period	year to date
Driver Pay	16.5000	42.50	701.25	28,243.98
Extra Pay				49.50
Gate Clerk				499.13
Holiday				396.00
Personal				132.00
Gross Pay			\$701.25	29,320.61

* Excluded from federal taxable wages
Your federal taxable wages this period are \$659.14

Other Benefits and Information	this period	total to date
401K Wages	701.25	

Deductions	Statutory		
Federal Income Tax	-60.10	3,046.56	
Social Security Tax	-40.87	1,721.19	
Medicare Tax	-9.55	402.54	
Other			
Ad & D Emp	-0.76	24.50	
Child Support	-38.08	1,218.56	
Garn Admin Fee	-6.00	192.00	
Ltd	-1.23	28.29	
Plax Dental	-2.00*	64.00	
Plax Hsa	-5.00*	370.00	
Plax Plan 1	-34.13*	1,092.16	
Plax Vision	-0.98*	33.34	
Spprt\$	-0.50	16.00	
Vol Life	-1.50	48.00	
Mvr		10.00	
Net Pay		\$500.54	
Checking1	-500.54		
Net Check		\$0.00	

Important Notes
YOUR COMPANY'S PHONE NUMBER IS 678-771-2600

LAZER SPOT, INC.
6525 SHILOH ROAD, SUITE 900
ALPHARETTA, GA 30005

Advice number: 00000320977
Pay date: 08/12/2016

Deposited to the account of	account number	transit ABA	amount
LEPATRICK DENTANIYON FEATHERSTON	xxxxxx4506	xxxx xxxx	\$500.54

THIS IS NOT A CHECK

NON-NEGOTIABLE

GABROY LAW OFFICES
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

IAFD
GABROY LAW OFFICES
Christian Gabroy, Esq. (#8805)
Kaine Messer (#14240)
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Tel (702) 259-7777
Fax (702) 259-7704
Christian@gabroy.com
Kmesser@gabroy.com
Attorneys for Plaintiff

DISTRICT COURT

EIGHTH JUDICIAL DISTRICT COURT, CLARK COUNTY NEVADA

LEPATRICK FEATHERSTON, an
individual, on behalf of himself and all
persons similarly situated;

Case No.
Dept.:

Plaintiffs,

vs.

Initial Appearance Fee Disclosure

LAZER SPOT, INC., a foreign
corporation; EMPLOYEE(S)/AGENT(S)
DOES I-X; and ROE CORPORATIONS XI-
XX, inclusive,

Defendants.

Pursuant to NRS Chapter 19, filing fees are submitted for parties appearing in
the above-captioned action as indicated below:

Lepatrick Featherston, Plaintiff \$270.00

TOTAL REMITTED \$270.00

///

///

///

///

GABROY LAW OFFICES
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

1 Dated this 22nd day of March 2017.

2 GABROY LAW OFFICES.

3 By: 

4 Christian Gabroy (#8805)
5 Kaine Messer (#14240)
6 170 South Green Valley Parkway,
7 Suite 280
8 Henderson, Nevada 89012
9 Tel (702) 259-7777
10 Fax (702) 259-7704
11 christian@gabroy.com
12 kmesser@gabroy.com
13 Attorneys for Plaintiff

DISTRICT COURT CIVIL COVER SHEET

A-17-752871-C

Clark County, Nevada

Case No. _____
(Assigned by Clerk's Office)

XXXXII

I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone): LEPATRICK FEATHERSTON, an individual;	Defendant(s) (name/address/phone): LAZER SPOT, INC., a foreign corporation; EMPLOYEE(S)/AGENT(S) DOES I-X; and ROE CORPORATIONS XI-XX, inclusive
Attorney (name/address/phone): Gabroy Law Offices 170 S Green Valley Parkway, Suite 280 Henderson, NV 89012 (702) 259-7777	Attorney (name/address/phone):

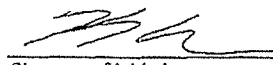
II. Nature of Controversy (please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input checked="" type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate Probate (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court civil coversheet.

3/22/2017

Date


 Signature of initiating party or representative

See other side for family-related case filings.

NOTC

GABROY LAW OFFICES
Christian Gabroy, Esq. (#8805)
Kaine Messer (#14240)
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Tel (702) 259-7777
Fax (702) 259-7704
christian@gabroy.com
kmesser@gabroy.com
Attorney for Plaintiff

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

LEPATRICK FEATHERSTON, an
individual, on behalf of himself and all
persons similarly situated;

Plaintiffs,

vs.

LAZER SPOT, INC., a foreign
corporation; EMPLOYEE(S)/AGENT(S)
DOES I-X; and ROE CORPORATIONS XI-
XX, inclusive,

Defendants.

Case No. A-17-752871-C
Dept. No. XXXII

NOTICE OF AFFIDAVIT OF SERVICE

NOTICE OF AFFIDAVIT OF SERVICE

COMES NOW Plaintiff Lepatrick Featherston by and through his attorneys of
record, Christian Gabroy, Esq. and Kaine Messer, Esq. of Gabroy Law Offices, and
hereby Notices the Affidavit of

///

///

///

///

1 Service Upon Lazer Spot, Inc. (*see Exhibit I*).

2 DATED this 19th day of April 2017.

3
4 RESPECTFULLY SUBMITTED,

5 GABROY LAW OFFICES

6
7 By: 

8 GABROY LAW OFFICES

9 Christian Gabroy (#8805)

10 Kaine Messer (#14240)

11 The District at Green Valley Ranch

12 170 South Green Valley Parkway, Suite 280

13 Henderson, Nevada 89012

14 Tel (702) 259-7777

15 Fax (702) 259-7704

16 *Attorneys for Plaintiff*

GABROY LAW OFFICES

170 S. Green Valley Pkwy., Suite 280

Henderson, Nevada 89012

(702) 259-7777 FAX: (702) 259-7704

EXHIBIT I

AFFIDAVIT OF SERVICE

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, STATE OF NEVADALEPATRICK FEATHERSTON, an individual, on behalf
of himself and all persons similarly situated,

Plaintiff(s)

v.

LAZER SPOT, INC., a foreign corporation; et al.,

Defendant(s)

Case No.:A-17-752871-C
Christian J. Gabroy, Esq. Bar No. 8805
GABROY LAW OFFICES
170 S. Green Valley Parkway, Suite 280
Henderson, NV 89012
(702) 259-7777
Attorneys for the Plaintiff
Client File# Featherston

I, Judith Mae All, being sworn, states: That I am a licensed process server registered in Nevada. I received a copy of the Summons; Complaint with Jury Demand, from GABROY LAW OFFICES

That on 4/11/2017 at 3:27 PM I served the above listed documents to Lazer Spot, Inc. - c/o CSC Services of Nevada, Inc., Registered Agent by personally delivering and leaving a copy at 2215-B Renaissance Drive, Las Vegas, NV 89119-6727 with Taylor Lee - Customer Service Specialist, a person of suitable age and discretion, authorized by Registered Agent to accept service of process at the above address shown on the current certificate of designation filed with the Secretary of State.

That the description of the person actually served is as follows:

Gender: Female, Race: Caucasian, Age: 20's, Height: Seated, Weight: 120 lbs., Hair: Black/Brown, Eyes: Brown/Glasses

I being duly sworn, states: that all times herein, Affiant was and is over 18 years of age, not a party to or interested in the proceedings in which this Affidavit is made. I declare under perjury that the foregoing is true and correct.

Date: 4/18/17

Judith Mae All
Judith Mae All
Registered Work Card# R-040570
State of Nevada

(No Notary Per NRS 53.045)

Service Provided for:
Nationwide Legal Nevada, LLC
626 S. 7th Street
Las Vegas, NV 89101
(702) 385-5444
Nevada Lic # 1656

